

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUN 22, 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CORTLAND IVERSON,

and

ROMEL HANDSON,

Defendants.

4:16CR260 CEJ/NCC

INDICTMENT

The Grand Jury charges that:

COUNT 1

[WIRE FRAUD CONSPIRACY: 18 U.S.C. § 1349]

INTRODUCTION

1. Beginning in or about January of 2015 and continuing until in or about March of 2015, in the Eastern District of Missouri, **CORTLAND IVERSON** and **ROMEL HANDSON**, the defendants herein, and other conspirators, both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to commit the following offense against the United States:
 - a. To devise and intend to devise a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme described above, and attempting to do so, to cause to be transmitted by means of wire communication

in interstate commerce signals and sounds, in violation of Title 18, United States Code, Section 1343.

MANNER AND MEANS

The ways, manner and means by which the foregoing objective of the conspiracy to commit wire fraud were to be accomplished included, but were not limited to, the following:

2. The primary purpose of the conspiracy was for the defendants fraudulently to obtain direct deposit payroll payments intended to be paid to their legitimate recipients by accessing the internal network of "EWS," a payroll processing company, and performing an unauthorized reset of customer payroll accounts to direct payments to bank accounts within the control of the conspirators.
3. It was a part of the conspiracy that the conspirators created an email account using the address "nnewme72@gmail.com."
4. It was further a part of the conspiracy that the conspirators opened Metabank account no. ***** 9694 through the netSpend service.
5. It was further a part of the conspiracy that the conspirators opened JP Morgan Chase account no. **** * 3893 through the Rushcard service.
6. It was further a part of the conspiracy that **CORTLAND IVERSON**, an employee of "EWS," logged onto EWS's internal network, and without authorization, performed a hard reset of customer payroll accounts which allowed for the customer accounts to be modified.
7. It was further a part of the conspiracy that the conspirators remotely accessed the customer payroll accounts and made modifications to those accounts. The conspirators changed the email contact information to "nnewme72@gmail.com" and changed the

bank direct deposit payroll information of victims "JR," "CP," "WEW," "NT," "MDT," "LD," "MT" and "CG" from the correct bank accounts to the Metabank account 9694 opened by the conspirators.

8. It was further a part of the conspiracy that the conspirators remotely accessed additional customer payroll accounts and made modifications to those accounts. The conspirators changed the email contact information to "nnewme72@gmail.com" and changed the bank direct deposit payroll information of victims "SW" and "SS" from the correct bank accounts to the Rushcard account 3893 opened by the conspirators.
9. It was further a part of the conspiracy that the conspirators altered the account profile information of the individual victims to include as a contact email address the nnewme72@gmail.com address created by the conspirators, which meant that electronic notification of the alteration to the direct deposit accounts was sent to an email address maintained by the conspirators, rather than to the email addresses originally given by the individual victims.
10. It was further a part of the conspiracy that **ROMEL HANDSON** made multiple withdrawals from Metabank account no. 9694 of direct deposit payments that had been fraudulently redirected from the correct accounts into Metabank account no. 9694.

All in violation of Title 18, United States Code, Section 1349.

DATED: _____

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Gwendolyn E. Carroll
Assistant United States Attorney